

1 KEN THERRIEN
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5 **Attorney for Defendant**

6 MIGUEL REYES GARCIA

7
8 **IN THE UNITED STATES DISTRICT COURT**
9 **FOR THE EASTERN DISTRICT OF WASHINGTON**
10 **(Honorable Edward F. Shea)**

11 UNITED STATES OF AMERICA,)

12 Plaintiff,)

13 vs.)

14 MIGUEL REYES GARCIA,)

15 Defendant.)

CR-15-6049-EFS-21

DEFENDANT JOINT AND
PROPOSED JURY
INSTRUCTIONS

16 The Defendant, Miguel Reyes Garcia, joins in the Proposed Jury
17 Instructions, 3.4, 3.5, 3.7, 3.9, 3.10. of Defendant Herrera Farias. The
18 defendant, also joins in with the Governments' proposed instructions to the
19 extent they apply to the charges in Count 1 of the Second Superseding
20 Indictment and do not conflict with the jury instructions previously agreed
21 to in Mr. Herrera Farias' instruction. The defendant files his Proposed Jury
22 Instruction 8.22: Multiple Conspiracy. The defendant respectfully requests
23 leave to supplement his proposed jury instructions with permission of the
24 Court.

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26 DEFENDANT JOINT AND PROPOSED
27 JURY INSTRUCTIONS - 1

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1 RESPECTFULLY submitted this 1st day of October, 2018.
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3 s/Ken Therrien
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5 KEN THERRIEN, WSBA #20291
6 Attorney for Miguel Reyes Garcia
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9 **CERTIFICATE OF SERVICE**
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11 I hereby certify under penalty of perjury of the laws of the State of Washington
12 that on October 1, 2018, I electronically filed the foregoing with the Clerk of
13 the Court using the CM/ECF System which will send notification of such
14 filing to the following: Stephanie Van Marter, Assistant United States
15 Attorney.
16

17 s/ Ken Therrien
18

19 KEN THERRIEN, WSBA #20291
20 Attorney for Miguel Reyes-Garcia
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26 DEFENDANT JOINT AND PROPOSED
27 JURY INSTRUCTIONS - 2
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JURY INSTRUCTION NO. ____

You must decide whether the conspiracy charged in the indictment existed, and, if it did, who at least some of its members were. If you find that the conspiracy charged did not exist, then you must return a not guilty verdict, even though you may find that some other conspiracy existed. Similarly, if you find that any defendant was not a member of the charged conspiracy, then you must find that defendant not guilty, even though that defendant may have been a member of some other conspiracy.